

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S SEVENTH SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS MODEN (DMA/USPS-T4-63-85)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached seventh set of interrogatories and requests for production of documents to USPS witness Moden (DMA/USPS-T4-63-85). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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September 16, 1997

Witness Moden (USPS-T-4)

DMA/USPS-T4-63. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Section 7, Regulation 1.B.2 of the APWU Agreement, flexible part-time employees must be scheduled prior to scheduling casuals.

DMA/USPS-T4-64. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Section 7, Regulation 3 of the APWU Agreement, a flexible part-time employee will be converted to a full-time employee if one works on the same assignment for eight (8) hours within 10 hours on the same 5 days per week over a six (6) month time period.

DMA/USPS-T4-65. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that overtime for a flexible part-time employee is identified as more than eight (8) hours on a service day.

DMA/USPS-T4-66. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which flexible part-time employees are scheduled for work.
- (b) Please explain how far in advance a flexible part-time employee is scheduled and the employees' capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a flexible part-time employee could potentially have on a given service day.

DMA/USPS-T4-67. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which casual employees are scheduled for work.
- (b) Please explain how far in advance a casual employee is scheduled and the employees capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work, or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a casual employee could potentially have on a

given service day.

DMA/USPS-T4-68. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that a casual employee is paid overtime when the employee works more than eight (8) hours on a service day or more than forty (40) hours in a service week. If not, please correct this statement.

DMA/USPS-T4-69. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please explain in detail the parameters within which transitional employees are scheduled for work.
- (b) Please explain how far in advance a transitional employee is scheduled and the employees' capacity to refuse a work shift.
- (c) Please explain whether or not an employee is given a set number of hours to work or whether an employee is told in advance whether or not overtime will be expected.
- (d) Please explain how many shifts a transitional employee could potentially have on a given service day.

DMA/USPS-T4-70. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Article 8, Section 4.G of the APWU Agreement, a transitional employee is paid overtime when the employee works more than forty (40) hours in a service week.
- (b) What is the maximum number of consecutive hours a transitional employee can be scheduled to work?

DMA/USPS-T4-71. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Section 8, Regulation 2.C of the APWU Agreement, the work week of a full-time regular employee does not necessarily consist of five (5) consecutive service days.
- (b) Please confirm that the work week can be made up of any 5 service days within the calendar week, which extends from 12:01 a.m. Saturday through 12 midnight Friday.

DMA/USPS-T4-72. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Please confirm that, in accord with Section 8, Regulations 1 and 2 of the APWU Agreement, a full-time employee is guaranteed 40 hours of work per week over

the course of five (5) service days.

- (b) Please confirm that each service day for a full-time employee consists of eight (8) hours within ten (10) consecutive hours, except in a facility with more than 100 full-time employees, where each service day consists of eight (8) hours within nine (9) consecutive hours.

DMA/USPS-T4-73. Please refer to your response to DMA/USPS-T4-24(a).

- (a) Does a full-time regular employee have a predetermined work schedule that is consistent from week to week ?
- (b) If your response to subpart (a) is "no":
 - (i) How much input does the employee have as to his schedule?
 - (ii) How far in advance is the employee's schedule determined?
 - (iii) If the employee is not able to work a scheduled shift, what action is taken?
 - (iv) Is the employee able to exchange shifts with another employee?
 - (v) If your response to subpart (b)(iv) is "yes," must management approve such a change?

DMA/USPS-T4-74. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.D of the APWU agreement, a full-time regular employee can be required to work overtime by management.

DMA/USPS-T4-75. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 5.E of the APWU agreement, management has full, unrestricted latitude to approve a full-time regular employee's request to be excused from required overtime.

DMA/USPS-T4-76. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section F of the APWU agreement, a full-time regular employee cannot be required to work overtime for more than four (4) of five (5) scheduled days in a service week.

DMA/USPS-T4-77. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section F of the APWU agreement, a full-time regular employee who did not sign the "Overtime Desired" list cannot be required to work more than ten (10) hours on a regularly scheduled day, eight (8) hours on a non-scheduled day, or more than six (6) days in a service week.

DMA/USPS-T4-78. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that,

in accord with Article 8, Section G of the APWU agreement, a full-time regular employee who did sign the "Overtime Desired" list can be required to work as much as, but no more than, twelve (12) hours per day and sixty (60) hours in a service week.

DMA/USPS-T4-79. Please refer to your response to DMA/USPS-T4-24(a).

- (a) How far in advance is overtime scheduled?
- (b) How much notice is an employee given that overtime is desired?
- (c) How much notice is an employee given that overtime is required?

DMA/USPS-T4-80. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, if a full-time regular employee is called in outside of and not consecutive to a regular shift, the employee is guaranteed 4 hours of work or pay, and if the employee is called in a non-scheduled service day, the employee is guaranteed 8 hours of work or pay.

DMA/USPS-T4-81. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a part-time regular employee, part-time flexible employee, casual employee, and transitional employee are each guaranteed 4 hours of work or pay if called in outside of and not consecutive to a regular shift.

DMA/USPS-T4-82. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a part-time regular employee, part-time flexible employee, and casual employee are each guaranteed four (4) hours of work or pay when scheduled or requested to work in a facility with over 200 man years of employment per year. In other facilities, each such employee is guaranteed two (2) hours of work or pay.

DMA/USPS-T4-83. Please refer to your response to DMA/USPS-T4-24(a). Please confirm that, in accord with Article 8, Section 8 of the APWU agreement, a transitional employee is guaranteed two (2) hours of work or pay for scheduled shifts, as long as they were not directed not to report prior to the scheduled shift.

DMA/USPS-T4-84. Please refer to your response to interrogatory ABP/USPS-T4-11, in which you state that an informal survey was conducted to determine how many more barcoded pieces there would be in the test year if bar-code readers were affixed to FSM 1000 equipment.

- (a) When was this survey conducted?
- (b) If a survey instrument was used, please provide it.
- (c) Please describe the participants in this survey.

- (d) Please provide a detailed account of the findings of this survey. How many non-automated, non-machinable pieces does the survey suggest would become barcoded in the test year?

DMA/USPS-T4-85. Please refer to your direct testimony at page 9, lines 22-26, and to your response to interrogatory NAA/USPS-T4-7.

- (a) What percentage of total routes are in zones possessing 10 or more city routes and/or rural routes with city style addressing?
- (b) What percentage of the total volume of letters do the routes in subpart (a) receive?
- (c) What percentage of total routes are in zones with five to nine routes?
- (d) What percentage of the total volume of letters do the routes in subpart (c) receive?
- (e) What percentage of total routes are represented by the 1,183 zones with fewer than 10 routes that receive DPS as a result of local decisions?
- (f) What percentage of the total volume of letters do the routes in subpart (e) receive?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.


Michael D. Bergman

September 16, 1997